

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT
DOCKET NO. 24-4020**

UNITED STATES OF AMERICA)	
)	
v.)	MOTION FOR
)	EXTENSION OF
)	TIME TO RESPOND
)	
SHAY NEIL JOHN,)	
Defendant)	

Undersigned counsel asks this Court for an extension of time to advise the Court whether he wishes to adopt the previously filed brief in this appeal, move to file a supplemental brief, or move to strike the brief and file a new brief.

1. Defendant appealed following a four-day jury trial. The transcript contains 374 pages, and approximately 90 exhibits were admitted into evidence.

2. Defendant's prior counsel filed a brief on May 16, 2024. The Government filed its brief on June 18, 2024.

3. On July 11, 2024, this Court directed undersigned counsel to advise the Court whether he wishes to adopt Defendant's filed brief, move to file a supplemental brief, or move to strike the brief and file a new brief by today, July 18, 2024.

4. Undersigned counsel received the joint appendix on July 12, 2024, by U.S. Postage.

5. Undersigned counsel received the sealed joint appendix on July 15, 2024.

6. Undersigned counsel needs additional time to review the case to properly and competently advise this Court of his intentions.

7. The Government does not object to an extension of time for undersigned counsel to respond.

WHEREFORE, undersigned counsel asks this Court to extend the time within which he must respond by two weeks.

This the 18th day of July 2024.

/s/ Amos G. Tyndall
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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Motion for Extension of Time to Respond on the following using the CM/ECF system:

Julie Niemeier
Assistant United States Attorney
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This 18th day of July 2024.

/s/ Amos G. Tyndall
Counsel for Appellant